

207198  
RECORD NO.

105501  
SHAUGHNESSEY NO.

REVIEW NO.

EEB REVIEW

DATE: IN 2-17-88 OUT 2-29-88

FILE OR REG. NO 1471-101

PETITION OR EXP. NO.

DATE OF SUBMISSION 10-23-87

DATE RECEIVED BY HED 2-17-88

RD REQUESTED COMPLETION DATE ASAP

EEB ESTIMATED COMPLETION DATE ASAP

RD ACTION CODE/TYPE OF REVIEW 650

TYPE PRODUCT(S) : I, D, H, F, N, R, S Herbicide

DATA ACCESSION NO(S).

PRODUCT MANAGER NO. Robert Taylor (25)

PRODUCT NAME(S) Tebuthiuron

COMPANY NAME Elanco Products Company

SUBMISSION PURPOSE Registrant response concerning  
registration standard data requirement

SHAUGHNESSEY NO. 105501 CHEMICAL, & FORMULATION Tebuthiuron % A.I.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

MAR 1 1988

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Elanco request a waiver from any nontarget area phytotoxicity requirements in the re-registration process of tebuthiuron.

FROM: Ken Clark *Ken Clark*  
Ecological Effects Branch  
Hazard Evaluation Division (TS-7690)

THRU: Douglas Urban, Section Head III *Douglas Urban*  
Ecological Effects Branch  
Hazard Evaluation Division (TS-769C) 3/01/88

THRU: Harry Craven, Acting Chief *Harry Craven*  
Ecological Effects Branch  
Hazard Evaluation Division (TS-769C) 3/1/88

TO: Robert Taylor, PM 25  
Herbicide/Fungicide Branch  
Registration Division (TS-767C)

EEB agrees with Elanco that TIER I phytotoxicity testing would be nonproductive since all the plant species would be killed at the required application rate. However, because data are available in the open literature on the phytotoxicity of tebuthiuron and because it is likely that drift will occur to nontarget plant species, testing must be conducted at the TIER II level to establish EC50 values. The TIER II level consist of following three tests:

- Seed Germination/Seedling Emergence (123-1)
- Vegetative Vigor (123-1)
- Aquatic Plant Growth (123-2) 1/

1/ Required because of ditch bank use which is considered a direct application to water.

The registrant has already submitted the TIER I Aquatic Plant Growth test using Selenastrum capricornutum. Therefore, in order to satisfy the data requirement of five test species, required for the TIER II Aquatic Plant Growth test (123-2), the four remaining species are required.

- |                                |                   |
|--------------------------------|-------------------|
| 1) <u>Lemna gibba</u>          | Duckweed          |
| 2) <u>Skeletonema costatum</u> | Marine diatom     |
| 3) <u>Anabaena flos-aquae</u>  | Blue-green alga   |
| 4) (Unspecified species)       | Freshwater diatom |